Closed captioning is critical to deaf and hard of hearing. Our personal safety and
our quality of life is affected each and everyday. Individuals, like myself, who rely
on closed captioning in order to have access to video programming, continue to
experience problems with the captioning quality.

I worked in the television industry for over 20 years when I suffered hearing loss
due to an accident. I was working in a TV station when the FCC implemented the
original captioning regulations. The purpose was just to get captions on your TV. It
left the quality standard up to the caption company and the video distributer. While
each captioning company “feels” that they are producing quality captioning, many
companies are not realistic. A television program where the captioning is filled with
errors is hard to understand. At times, captions or text is 5 to 7 seconds behind
the audio and video on the screen. At this point captions are either paraphased or
are often cut off in the final minutes of a show or story to allow the person
captioning to catch up. This leaves the deaf or hard of hearing person never
knowing what the conclusion of the story or show was.

Just last year my company, Visualize It, began working as a consultant to a
captioning company. We monitor its captioning quality. I have created a system
that rates captioning on what is spoken “verbatim”. It is a standard that can
measure and compare all captioning equally. After the information is rated in
percentages, the captioning company then uses the report and information to
monitor and improve the quality of realtime captioning with in their company.

A realiable method of monitoring and enforcement is required in order to increase
accountability for noncompliance with the rules. Bad captioning is no captioning. I
have been working diligently to divise a fare and reasonable method of quality
control for captioning. I feel that my system of the verbatim provides the deaf and
hard of hearing with good quality captioning.

Here at Visualize It, we believe every word spoken needs to be captioned. Inorder
to do that, the person captioning must be prompt and timely with the captions
with few errors. Once the captioned text falls behind what is spoken, caption errors
increase drastically.

We do not believe that the FCC should adopt any standard that allows for delayed
captions or accuracy based on a percentage of what was captioned. After reviewing
many programs, I have found that while many caption companies claim to have
99% accuracy. Only 80% of a program may have been captioned, with captioning 5
to 7 seconds delayed at times. While the 99% acuracy they boast may sound great,
it is based on what was captioned, not spoken.

Since I too must use captions for my TV viewing, I have a vested interest in it. I have found that good captioning should be between 90 - 99% accurate using the verbatim method created at Visualize It. For over a year, Visualize It has been rating captioning for one of our clients. We have taken the time to understand the captioning business and it's demands. Achieving a 95% accuracy rating with Visualize It is excellent.

After working in Television engineering for years, I have come to understand how the local video providers feel about captioning. We need to ensure that any occurrences of technical problems are minimized and are remedied efficiently and expeditiously. The recent FCC fines given to three TV stations in San Diego for not captioning the Wildfires of 2003 was a start, but not enough. It is much cheaper and easier for a TV station to pay one fine every 15 years or so, than to set aside money for yearly emergency captioning.

The FCC must adopt quality standards in order to ensure that video programming is fully accessible to all viewers who rely on captioning. These standards need to be randomly monitored by persons other than the caption companies or the video providers.